

# **Exhibit E**

## FIRM RESUME



## FIRM OVERVIEW



Founded on April 28, 2003, by Ronald L. Motley (1944–2013) and Joseph F. Rice, Motley Rice LLC is one of the nation's largest plaintiffs' law firms. Our attorneys, assisted by more than 200 support personnel, possess extensive experience in a wide variety of civil litigation.

Motley Rice lawyers initially gained national recognition for their work representing asbestos victims in the 1970s and 1980s, conducting some of the first successful representations of injured persons against the asbestos industry. Motley Rice remains deeply involved in asbestos litigation in various jurisdictions across the country. The firm continues to represent clients through involvement on numerous asbestos bankruptcy trust committees and is active in other workers' rights and toxic tort cases.

In the 1990s, Motley Rice attorneys took on the tobacco industry. Armed with evidence acquired from whistleblowers, individual smokers' cases, and tobacco liability class actions, the attorneys led the campaign of 26 states' Attorneys General and several municipalities to recoup state healthcare funds and exact marketing restrictions from cigarette manufacturers. Through the litigation, "a powerful industry was forced by U.S. courts to reveal its internal documents that explain what nine tobacco companies knew, when they knew it and what they concealed from the public about their dangerous product."<sup>\*</sup> The effort restricted cigarette marketing to children and culminated in the \$246 billion Master Settlement Agreement, the largest civil settlement in U.S. history.

Following the Sept. 11, 2001 terrorist attacks, Motley Rice lawyers brought a landmark lawsuit against the alleged private and state sponsors of al Qaeda and Osama bin Laden. Motley Rice has undertaken a global investigation into terrorism financing. In the course of this investigation, Motley Rice created an entire anti-terrorism and human rights practice which includes cases against defendants involved in terrorist acts by Libya, Hamas suicide bombers in Israel, and other corrupt regimes' human rights abuses. Motley Rice attorneys also held a crucial role in executing the strategic mediations and/or settlements in 56 aviation liability and damages cases against multiple defendants on behalf of families of the victims of the 9/11 attacks who opted out of the VCF.

Our lawyers continue to be selected to lead federal and state medical device and drug litigation brought by injured people alleging medical manufacturers put profits before safety. Our catastrophic injury lawyers fight for adults and children seriously injured or killed by defective products such as dangerous toys or in tragic events such as devastating fires.

In 2010, our environmental team began representing people and businesses harmed by the Deepwater Horizon oil spill in the Gulf of Mexico and our attorneys had a central role in negotiating the two class action settlements reached between BP and the litigation Plaintiffs' Steering Committee, one of which is the largest civil class action settlement in U.S. history.

We continue our efforts to hold responsible national and international corporations and organizations that willfully and knowingly harm people and have expanded our other practice areas to seek protections for shareholders, seek change in corporate cultures and bring to light issues that affect safety, security and rights of consumers, investors and the public.

The firm's lawyers regularly litigate complex cases involving multiple parties in state and federal jurisdictions throughout the United States, either as sole counsel for the plaintiffs or in association with local counsel and other firms. Additionally, Motley Rice lawyers maximize the use of alternative dispute resolution where appropriate, such as negotiation, mediation and arbitration, making it possible to avoid protracted litigation in some cases. Motley Rice employs state-of-the-art technology by using video conferencing, extranet access, and a document management system that enables the firm to process and enter into the database thousands of articles, liability documents and all other information and documents used in litigation proceedings.

The firm has offices in Mt. Pleasant, SC; Providence, RI; Hartford, CT; New York, NY; Morgantown, WV; Charleston, WV; Washington, D.C.; New Orleans, LA; and Kansas City, Missouri.

<sup>\*</sup>World Health Org., *The Tobacco Industry Documents: What They Are, What They Tell Us, and How to Search Them* (July 2004), available at [www.who.int/tobacco/communications/TI\\_manual\\_content.pdf](http://www.who.int/tobacco/communications/TI_manual_content.pdf).

## LITIGATION PROFILES *Motley Rice has held leadership roles in numerous cases. Highlights include:*

### DEFECTIVE DRUGS AND DEVICES

Plaintiffs' Steering Committee of *In re Power Morcellator Products Liability Litigation*, MDL No. 2652

Co-lead counsel *In re Zofran (Ondansetron) Products Liability Litigation*, MDL No. 2657

Plaintiffs' Leadership Counsel of *In re Bard IVC Filters Products Liability Litigation*, MDL 2641

Plaintiffs' Steering Committee of *In re Lipitor® (Atorvastatin Calcium) Marketing, Sales Practices and Products Liability Litigation*, MDL 2502.

Co-lead plaintiffs' counsel and liaison counsel *In re Kugel Mesh Hernia Patch Products Liability Litigation*, MDL No. 07-1842 (D.R.I.), Rhode Island federal court's first consolidated MDL, on behalf of thousands of people alleging injury by the hernia repair patch manufactured by Davol, Inc., as well as liaison counsel for the nearly 2,000 lawsuits consolidated in Rhode Island state court.

Co-lead coordinating counsel of *In re Ethicon, Inc., Pelvic Repair Systems Products Liability Litigation*, MDL 2327 (S.D.W.Va.)

Co-lead counsel in the *In re American Medical Systems, Inc., Pelvic Repair Systems Products Liability Litigation*, MDL 2325 (S.D.W.Va.)

Co-liaison counsel *In re C.R. Bard, Inc., Pelvic Repair Systems Products Liability Litigation*, MDL 2187 (S.D.W.Va.)

Co-lead counsel *In re Boston Scientific Corp., Pelvic Repair Systems Products Liability Litigation*, MDL 2326, (S.D.W.Va.)

Co-liaison counsel *In re Pelvic Mesh Litigation/Bard*, No. L-6339-10 in New Jersey state court.

State court liaison counsel of *In re Bard Litigation* in Massachusetts and Delaware

Co-lead counsel of the *Mirena MDL* (S.D.N.Y.)

Co-lead counsel in the *In re Mirena Product Liability* state court consolidation in New Jersey

Plaintiffs' Steering Committee of *In re Zoloft (Sertraline Hydrochloride) Products Liability Litigation*, MDL 2342

Plaintiffs' Steering Committee of *In re NuvaRing Products Liability Litigation*, MDL 1964

Plaintiffs' Steering Committee of *In re DePuy Orthopaedics, Inc. ASR Hip Implant Products Liability Litigation*, MDL 2197

Plaintiffs' Steering Committee of *In re DePuy Orthopaedics, Inc. Pinnacle Hip Implant Products Liability Litigation*, MDL 2244

*In re A.H. Robins Co., Inc., "Dalkon Shield" IUD Products Liability Litigation* (No. II), MDL 631

Plaintiffs' Steering Committee of *In re Medtronic, inc., Sprint Fidelis Leads Products Liability Litigation*, MDL 1905

Plaintiffs' Steering Committee of *In re Trasyol Products Liability Litigation*, MDL 1928

Plaintiffs' Steering Committee of *In re Levaquin Products Liability Litigation*, MDL 1943

Plaintiffs' Steering Committee and co-lead counsel of *In re Digitek Products Liability Litigation*, MDL 1968

Plaintiffs' Steering Committee of *In re Avandia Marketing, Sales Practices and Products Liability Litigation*, MDL 1871

Plaintiffs' Steering Committee of *In re Hydroxycut Marketing and Sales Practice Litigation*, MDL 2087

Plaintiffs' Steering Committee of *In re Zicam Cold Remedy Marketing, Sales Practices and Products Liability Litigation*, MDL 2096

Plaintiffs' Steering Committee and co-lead counsel of *In re Human Tissue Products Liability Litigation*, MDL 1763

*In re Temporomandibular Joint (TMJ) Implants Products Liability Litigation*, MDL 1001

*In re Abbott Laboratories Omniflox Products Liability Litigation*, MDL 1004

*In re Viagra Products Liability Litigation*, MDL 1724

Plaintiffs' Steering Committee and liaison counsel of *In re Showa Denko K.K. L-tryptophan Products Liability Action*, MDL No. 865

### TOXIC TORTS AND OCCUPATIONAL DISEASE

*Bongani Nkala & Others v. Harmony Gold Mining Company Limited & Others*, No. 48226/12 (South Gauteng High Court, Johannesburg). Motley Rice has been retained as a consultant by South African human rights lawyer Richard Spoor in his effort to take on leading global gold producers and seek justice for tens of thousands of exploited gold mine workers suffering from silicosis.

*Travelers Statutory Direct Action Settlement* (Bankr. Court, S.D.N.Y.), an eleven-state asbestos settlement with Travelers Insurance.

Chair, Plaintiffs' Steering Committee and liaison counsel for plaintiffs, *In re Asbestos Products Liability Litigation*, MDL 875 (E.D. Pa.).

Plaintiffs' Steering Committee and coordinating counsel, *Linscomb v. Pittsburgh Corning Corporation*, No. 1:90cv-05000 (E.D. Tex.), a national class action on behalf of asbestos victims nationwide.

Executive committee member in *In re Asbestos School Litigation*, No. 94-1494 (E.D. Pa.), a national school asbestos class action.

Lead plaintiffs' counsel in *Central Wesleyan College v. W.R. Grace & Co.*, No. 2:87-1860-8 (D.S.C.), a national asbestos property damage class action.

Lead plaintiffs' counsel in *In re Raymark Asbestos Exposure Cases*, No. 87-1016-K (D. Kan.), a national asbestos personal injury class action in which 19,684 claims were resolved.

Co-lead plaintiffs' counsel in *Cimino v. Pittsburgh Corning Corporation*, No. 1:85-CV-00676 (E.D. Tex.), an asbestos personal injury class action on behalf of approximately 2,300 plaintiffs.



Co-lead plaintiffs' counsel in **Chatham v. AC&S, et al.**, a consolidated asbestos personal injury action involving 300 plaintiffs in the Circuit Court of Harris County, Texas.

Co-lead plaintiffs' counsel in **Abrams v. GAF Corporation**, No. 88-5422(1) (Jackson Cty., Miss.), a consolidated asbestos personal action involving more than 6,000 plaintiffs.

Co-liaison plaintiffs' counsel in 3,000 asbestos personal injury cases in the Third Judicial Circuit of Illinois, Madison County, Illinois.

Co-lead plaintiffs' counsel in a consolidated asbestos personal injury action involving 540 plaintiffs pending in the Superior Court of Alameda County, California.

Counsel in numerous consolidated asbestos trials including 87 consolidated cases in Danville, Illinois; 300 consolidated cases in U.S. District Court, Western District of New York, Rochester, New York; 42 consolidated cases in State Court in Mississippi; and 315 consolidated cases in the Circuit Court of Kanawha County, West Virginia.

Plaintiffs' lead counsel in **In re Kansas Asbestos Cases** in U.S. District Court for the District of Kansas, **In re Madison County Illinois Asbestos Litigation**

Plaintiffs' lead counsel in **In re Wayne County Michigan Asbestos Cases**.

**John Schumacher v. Amtico, et al.**, No. 2:10-1627 (E.D.Pa.), the first federal court mesothelioma case to go to trial before Eduardo C. Robreno, the judge who oversees the entire Federal Asbestos MDL, **In re Asbestos Products Liability Litigation**, MDL 875.

Plaintiffs' Steering Committee of **In re Welding Fume Products Liability Litigation**, MDL 1535

## ENVIRONMENTAL CONTAMINATION

Plaintiffs' Steering Committee of **In re Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico on April 20, 2010**, MDL 2179, (E.D.La.), and lead settlement negotiators of the two class action settlements reached with BP, one of which is the largest civil class action settlement in U.S. history.

Lead trial counsel in **The People of the State of California v. Atlantic Richfield Company, et al.** No. 1-00-CV-788657 (Santa Clara Cnty. Super. Ct.) Resulting in 2014 verdict holding Sherwin-Williams Company, ConAgra Grocery Products and NL Industries Inc. liable for creating a public nuisance and ordered abatement of lead paint from homes within 10 California cities and counties.

**Michelle McMunn, et al. vs. Babcock & Wilcox Power Generation Group, Inc., et al.**, Civil Action No. 10-143 2:10-cv-00143-DSC-RCM

Lead plaintiffs' counsel in **Bates v. Tenco Services Inc.**, 132 F.R.D. 160 (D.S.C. 1990), a jet fuel pollution case involving the consolidated property damage and personal injury claims of multiple plaintiffs in the Gold Cup Springs subdivision.

## ANTI-TERRORISM AND HUMAN RIGHTS

Lead counsel in **In re Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al.**, Case No. 03-CV-9849 (GBD); **In re Terrorist Attacks on September 11, 2001**, 03 MDL 1570 (S.D.N.Y.), a landmark lawsuit against the alleged sponsors of al Qaeda and Osama bin Laden in an action filed on behalf of more than 6,500 family members, survivors, and those killed on 9/11.

**Linde et al. v. Arab Bank PLC**, No. 1:04-cv-02799 (E.D.N.Y.) and **Almog v. Arab Bank, PLC**, No. 1:04-cv-05564-NG-VVP (E.D.N.Y.), one of the first lawsuits brought against an international bank for its alleged role in financing terrorism.

**Mark McDonald, et al. vs. The Socialist People's Libyan Arab Jamahiriya, et al.**; No. 06-CV-0729-JR (DC 04/21/06), a high-profile case involving Libya's longtime alleged sponsorship of IRA acts of terror.

**Cummock, et al. v. Socialist People's Libyan Arab Jamahiriya, et al.**, No. 96-CV-1029 (D.D.C.). Victoria Cummock, Motley Rice's client, sought full accountability and a public trial as the only opt-out of the no-fault Pan Am 103/Lockerbite settlement.

**Krishanthi, et al. vs. Rajaratnam, et al.**; No. 09-CV-5395 (D.N.J.), terrorist financing litigation against alleged financiers of the Tamil Tigers terrorist organization in Sri Lanka.

Plaintiffs' Steering Committee and lead counsel for Verizon plaintiffs in **In re National Security Agency Telecommunications Records Litigation**, MDL 1791

**Ng v. Central Falls Detention Facility Corporation, et al.**, No. 09-53 (D. R.I.), a human rights case that alleged the defendants subjected a Chinese immigration detainee to extreme physical and mental abuse and torture while in U.S. custody.

**Harris, et al. v. Socialist People's Libyan Arab Jamahiriya, et al.**, No. 1:06-cv-00732-RWR (D.D.C.), a case filed against Libya involving the 1986 bombing of Berlin's LaBelle Discotheque.

## ANTITRUST/COMPETITION LAW

Interim Co-Lead Counsel in antitrust class action **In re Keurig Green Mountain Single-Serve Coffee Antitrust Litigation**, MDL No. 2542 (S.D.N.Y.).

Appointed to the Executive Committee in antitrust class action **In re Lidoderm Antitrust Litigation**, MDL No. 2521 (N.D.Cal.).

Interim Liaison Counsel **In Re Aggrenox Antitrust Litigation**, MDL No. 2516 (D.Conn.).

Co-lead counsel in antitrust class action **In re Loestrin 24 Fe Antitrust Litigation**, MDL 2472 (D.R.I.).

Co-lead counsel in antitrust class action **In re Suboxone (Bupreorphine Hydrochloride and Naloxone) Antitrust Litigation**, MDL 2445 (E.D. Pa.).

Co-lead counsel in antitrust class action **In re Niaspan Antitrust Litigation**, MDL 2460 (E.D. Pa.).

Co-lead counsel in antitrust class action *In re Effexor XR Antitrust Litigation*, No. 11-cv-05590 (D.N.J.).

Co-lead counsel for the end-payor antitrust class action *In re Actos Antitrust Litigation*, (S.D.N.Y.).

Co-lead counsel in antitrust class action *In re Lipitor Antitrust Litigation*, MDL 2332 (D.N.J.).

## CONSUMER PROTECTION, CATASTROPHIC INJURY AND WRONGFUL DEATH

Plaintiffs' Steering Committee of *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2672 CRB (JSC)

Plaintiffs' Executive Committee of *In re General Motors LLC Ignition Switch Litigation*, MDL 2543

*Hoover, et al. v. NFL, et al.*, MDL #2:12-cv-05209-AB (E.D. Pa.).

Lead counsel in *Charleston Firefighter Litigation v. Sofa Super Store, Inc., et al.*, No. 07-CP-10-3186 (Ct. of Common Pleas, Ninth Jud. Cir.), consolidated complex litigation involving the families of nine firefighters who died in a furniture store disaster.

*Clifton Chesnut, a minor v. Waupaca Elevator Company, Inc., et al.*, No. 2013-CP-10-2060 (Ct. of Common Pleas, Ninth Jud. Cir.).

*Veronica Lynne Tario v. SOCO, Holding, LLC et al.*, No. 2013-cv-26-2499 (Ct. of Common Pleas, Fifteenth Jud. Cir.).

*Satterfield et al. v. Napa Home & Garden Inc., et al.*, No. 7:11-1514-JMC (D.S.C.).

Plaintiffs' Steering Committee and multiple plaintiffs' counsel, *In re San Juan DuPont Plaza Hotel Fire Litigation*, MDL 721 (D.P.R.).

*Strother v. John Wieland Homes and Neighborhoods of the Carolinas, et al.*, No. 09-CO-29-1783 (Ct. of Common Pleas, Sixth Jud. Cir.), an individual catastrophic personal injury/premise liability case involving life-altering brain injury.

Plaintiffs' Steering Committee and Discovery Committee in *In re Bridgestone/Firestone, Inc. Tires Products Liability Litigation*, MDL 1373

*In re Ford Motor Co. E-350 Van Products Liability Litigation* (No. II), MDL 1687

Class counsel in *Carol Lee Whitfield, et al., v. Sangamo Weston*, No. 6:84-3184 (D.S.C.), a PCB personal injury and property damage class action settled while pending before U.S. District Court for the District of South Carolina, Greenville Division.

*In re Graniteville Train Derailment*, No. 2006-CP-02-1032 (Ct. of Common Pleas, Second Jud. Cir.). served in a leadership role for both individual and class action cases in connection with the January 2005 railroad derailment and chemical spill in Graniteville, S.C.

## AVIATION DISASTERS AND PASSENGER RIGHTS

Plaintiffs' liaison counsel in *In re September 11 Litigation*, No. 21-MC-97-AKH (S.D.N.Y), representing 56 of the 96 families that opted out of the no-fault federal September 11 Victim Compensation Fund in liability and damages cases claims against the airlines and aviation security companies for their alleged failure to implement basic security measures.

*Amanda Tuxworth v. Delta Air Lines, Inc.*, No. 2:10-cv-03212-RMG (D.S.C), an aviation passenger rights case involving a Delta passenger.

*Chris Turner, Individually and as Personal Representative of The Estate of Tracy Turner v. Ramo LLC, a Florida Limited Liability Company*, No. 11-14066 (Ct. of Appeals, 11th Cir.), an aviation case involving fraudulent transfer allegations in connection with a fatal plane crash.

Counsel for victims of Asiana Airlines Flight 214

Counsel for families of victims of Malaysia Airlines Flight MH370

## SECURITIES FRAUD

Co-class counsel in *Alaska Electrical Pension Fund v. Pharmacia Corp., No. 03-1519* (D.N.J.). federal securities fraud litigation alleging that the defendants misrepresented clinical trial results of Celebrex® to make its safety profile appear better than rival drugs.

Co-lead counsel in *Ross v. Career Education Corp.* No. 1:12-cv-00276 (N.D. Ill.).

Co-lead counsel representing a group of institutional shareholders *In re Allion Healthcare, Inc. Shareholders Litigation*, No. 5022-cc (Del. Ch.).

Co-lead counsel representing investors in *Robert Freedman v. St. Jude Medical, Inc.*, No. 0:2012cv03070 (D. Minn.).

Co-lead counsel representing investors in *In re Hewlett-Packard Co. Securities Litigation*, No. SACV 11-1404 AG (RNBx) (C.D. Cal.).

Co-lead counsel in *In re UBS AG Securities Litigation*, No.07 Cov. 11225 (RJS) (S.D.N.Y.).

Co-lead counsel representing institutional investors in *Hill v. State Street Corporation*, No. 09-cv-12146-NG (D. Mass.).

Sole lead counsel representing lead plaintiffs in *City of Brockton Retirement System v. Avon Products, Inc.*, No. 11 Civ. 4665 (PGG) (S.D.N.Y.).

Co-lead counsel on behalf of stockholders in *Marsden v. Select Medical Corporation*, No. 04-cv-4020 (E.D. Pa.).

Co-lead counsel on behalf of a class of investors in *South Ferry LP #2 v. Killinger*, No. C04-1599C-(W.D. Wash.) (regarding Washington Mutual).

Sole lead counsel representing the lead plaintiff in class action, *In re NPS Pharmaceuticals, Inc. Securities Litigation*, No. 2:06-cv-00570-PGC-PMW (D. Utah), concerning the drug PREOS.





Co-lead counsel for co-lead plaintiffs Drywall Acoustic Lathing and Insulation Local 675 Pension Fund and Metzler Investment GmbH in *In re Molson Coors Brewing Co. Securities Litigation*, No. 1:05-cv-00294 (D. Del.).

Co-lead plaintiffs' counsel in shareholder class action *In re The DirecTV Group, Inc. Shareholder Litigation*, No. 4581-VCP (Del. Ch.).

Sole lead counsel in *Manville Personal Injury Settlement Trust v. Gemunder*, No. 10-CI-01212 (Ky. Cir. Ct.) (regarding Omnicare, Inc.), a shareholder derivative complaint stemming from federal investigations into three kickback schemes.

Co-lead plaintiffs' counsel in *City of Sterling Heights General Employees' Retirement System v. Hospira, Inc.*, No. 11 C 8332 (N.D. Ill.), a securities fraud class action.

Co-lead counsel in *In re Rehabcare Group, Inc. Shareholders Litigation*, No. 6197-VCL (Del. Ch.), merger litigation involving the acquisition of healthcare provider RehabCare Group, Inc., by Kindred Healthcare, Inc.

Class counsel in *Brown v. Charles Schwab & Co.*, No. 2:07-cv-03852-DCN (D.S.C.), one of the first cases to interpret the civil liabilities provision of the Uniform Securities Act of 2002.

Co-lead counsel in class action *Bennett v. Sprint Nextel Corporation*, No. 2:09-cv-02122-EFM-KMH (D. Kan.), representing the PACE Industry Union-Management Pension Fund (PIUMPF) and several other institutional investors.

Co-lead counsel in securities class action settlement *In re MBNA Corporation Securities Litigation*, No. 05-CV-00272-GMS (D.Del.).

Lead counsel for lead plaintiffs in a securities class action involving a group of shareholders who purchased publicly-traded Dell securities in *In re Dell, Inc. Securities Litigation*, No. A-06-CA-726-SS (W.D. Tex.).

Co-lead counsel in *Minneapolis Firefighters' Relief Association v. Medtronic, Inc.*, No. 08-6324 (PAM/AJB) (D. Minn.), representing a class of investors who purchased Medtronic common stock.

Co-lead counsel in *In re Synovus Financial Corporation*, No. 1:09-cv-01811 (N.D. Ga.), for co-lead plaintiff Sheet Metal Workers' National Pension Fund, investors in Georgia bank Synovus Financial Corp.

Plaintiffs' Steering Committee and plaintiffs' liaison counsel, *In re Policy Management Systems Corporation*, No. 3:93-0807-JFA (D.S.C.).

Sole lead counsel, *In re Coventry Health Care, Inc. Securities Litigation*, No. 7905-CS (Del. Ch.), a shareholder class action challenging the \$7.2 billion acquisition of Coventry Health Care, Inc., by Aetna, Inc.

Co-lead counsel in Louisiana class action *In re The Shaw Group, Inc. Shareholders Litigation*, No. 614399 (19th Jud. Dist. La.).

Co-lead counsel, *In re Atheros Communications Inc. Shareholder Litigation*, No. 6124-VCN (Del. Ch.), merger litigation involving Qualcomm Incorporated's proposed acquisition of Atheros Communications, Inc.

## BANKRUPTCIES

Claimants' committee in *In re A.H. Robins*, a Chapter 11 Reorganization involving Dalkon Shield victims nationwide

Claimants Committee in the **Camall Chapter 11**, the first bankruptcy associated with the Fen-Phen litigation

**Motley Rice attorneys currently serve as a member of the trust advisory committee for several of the asbestos bankruptcy trusts formed under 524(g) of the federal bankruptcy code:**

**AC&S, Inc. Bankr.**, No. 02-12687 (D. Del.)

**Armstrong World Industries, Inc., Bankr.** No. 00-4471 (D. Del.)

**Babcock & Wilcox Co. Bankr.**, No. 00-10992 (E.D. La.)

**Celotex Corp. Bankr.**, Nos. 90-10016-8B1, 90-10017-8B1 (M.D. Fla.)

**Dresser II Bankr.**, No. 03-35592 (W.D. PA.)

**Federal Mogul Bankr.**, No. 01-10578 (D. Del.)

**G-I Holdings Bankr.**, Nos. 01-30135 and 01-38790 (D.N.J.)

**Johns-Manville Corp.**, No.82-B11656 through 82 B 11676 (S.D.N.Y., E.D.N.Y.)

**Kaiser Aluminum Corp. Bankr.**, No.02-10429 (D. Del.)

**Keene Bankr.**, No. 93B 46090,96 CV 3492 (S.D.N.Y.)

**MH Detrick Bankr.**, No. 98 B 01004 (N.D. Ill.)

**Owens Corning Corp. Bankr.**, No. 00-03837 (D. Del.)

**Rock Wool Bankr.**, Nos. CV-99-J-1589-S.BK -96-08295-TBB-11 (N.D. Ala.)

**Rutland Fire Clay Bankr.**, No. 99-11390 (D. Vt.)

**Shook & Fletcher Bankr.**, No. 02-02771-BGc-11 (N.D. Ala.)

**United States Gypsum Corp. Bankr.**, No. 01-2094 (D. Del.)

**W.R. Grace Co. Bankr.**, No.s 01-1139, 01-1140 (D. Del.)

**Motley Rice attorneys have served as lead or co-lead trial counsel on behalf of The Asbestos Claims Committee:**

**Armstrong World Industries, Inc., Bankr.** No. 00-4471 (D. Del.) (estimation trial and plan confirmation trial)

**Federal Mogul Bankr.**, No. 01-10578 (D. Del.) (estimation trial and plan confirmation trial)

**Owens Corning Corp. Bankr.**, No. 00-03837 (D. Del.) (estimation trial and substantive consolidation trial)

**Pittsburgh Corning Corp. Bankr.**, No. 00-22876 (W.D. Pa.) (plan confirmation trial)

**W.R. Grace Co. Bankr.**, Nos. 01-1139, 01-1140 (D. Del.) (estimation trial and plan confirmation trial)

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Motley Rice attorneys have served on The Asbestos Claims Committee involved in the formation and confirmation of various asbestos bankruptcy trusts.

**AC&S Bankr.**, No. 02-12687 (D. Del.)

**Babcock & Wilcox Bankr.**, No. 00-10992 (E.D. La.)

**Celotex Bankr.**, Nos. 90-10016-8B1, 90-10017-8B1 (M.D. Fla.)

**Combustion Engineering Bankr.**, D. Del. No. 03-10495 (D. Del.)

**Congoleum Corp. Bankr.**, No.03-51524 (D.N.J.)

**Durabla Corp. Bankr.**, No. 09-14415 (D. Del.)

**Federal Mogul Bankr.**, No. 01-10578 (D. Del.)

**G-I Holdings Bankr.**, Nos. 01-30135 and 01-38790 (D. N.J.)

**Johns-Manville Corp.**, No.82-B11656 through 82 B 11676 (E.D.N.Y.)

**Keene Bankr.**, No. 93B 46090,96 CV 3492 (S.D.N.Y.)

**MH Detrick Bankr.**, No. 98 B 01004 (N.D. Ill.)

**North American Refractories Corp. Bankr.**, No. 02-20198 (W.D. Pa.)

**Owens Corning Corp. Bankr.**, No. 00-03837 (D. Del.)

**Pittsburgh Corning Corp. Bankr.**, No. 00-22876 (W.D. Pa.)

**Rock Wool Bankr.**, Nos. CV-99-J-I589-S.BK-96-08295-TBB-11 (N.D. Ala.)

**Rutland Fire Clay Bankr.**, No. 99-11390 (D. Vt.)

**Shook and Fletcher Bankr.**, No. 02-02771-BGc-11 (N.D. Ala.)

**United States Gypsum Corp. Bankr.**, No. 01-2094 (D. Del.)

**W.R. Grace Co. Bankr.**, No.s 01-1139, 01-1140 (D. Del.)





## ACCOLADES FOR THE FIRM

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### **The Plaintiffs' Hot List**

*The National Law Journal*

2006 • 2012 • 2013 • 2014 • 2015 • 2016

### **"Best Law Firm"**

*U.S. News – Best Lawyers®*

*mass tort litigation/class actions-plaintiffs*

2010 • 2011 • 2012 • 2013 • 2014 • 2015 • 2016 • 2017

### **The Legal 500 United States Litigation editions**

*mass tort and class action: plaintiff representation-toxic tort*

2007 • 2009 • 2011 • 2012 • 2013 • 2014 • 2015 • 2016

### **"Elite Trial Lawyers"**

*The National Law Journal*

2014 • 2015

### **"Most Feared Plaintiffs Firm"**

*Law360*

2013 • 2015

*For full methodologies and selection criteria, visit [www.motleyrice.com/award-methodology](http://www.motleyrice.com/award-methodology)*

Please remember that every case is different. Although they endorse certain lawyers, *The Legal 500 United States* and *Chambers USA* and other similar organizations listed above are not Motley Rice clients. Any result we achieve for one client in one matter does not necessarily indicate similar results can be obtained for other clients.

**John M. Eubanks**

LICENSED IN: MD, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Supreme Court, U.S. Court of Appeals for the Second, Third, Fourth, Fifth and Eleventh Circuits

EDUCATION:

J.D., Georgetown University Law Center, 2003

B.S., Georgetown University, 1996

With extensive experience investigating terrorist organizations and terrorist financing in the Middle East, John Eubanks represents victims, survivors and their families in litigation designed to bankrupt the financiers of terror, crippling their ability to recruit, train, supply and dispatch terrorist operatives.

John is substantially involved in the firm's litigation on behalf of foreign terror victims and victims of international human rights abuses. He was a key member of the litigation team prosecuting *Linde et al. v. Arab Bank Plc*, the first litigation against a financial institution brought to trial under the Anti-Terrorism Act. In September 2014, a jury found Jordan-based Arab Bank Plc liable for financing terrorist activity, including funneling financial support to top Hamas leaders and to the families of Hamas suicide bombers. John is also pursuing Alien Tort Statute claims against Arab Bank for a separate class of plaintiffs.

John is also a member of the team pursuing a civil action against al Qaeda's alleged financiers and supporters arising out of the 9/11 terrorist attacks. He has pursued litigation against Libya for allegedly providing material resources to the Provisional Irish Republican Army, resulting in the death and injury of citizens of the United States and United Kingdom. John plays a key role in *Krishanthi, et al. v. Rajaratnam*, a case brought under the Alien Tort Statute involving allegations of American-sourced financing for dozens of terrorist attacks in Sri Lanka carried out by the Liberation Tigers of Tamil Eelam. He was also extensively involved in an Alien Tort Statute case on behalf of young boys allegedly kidnapped for enslavement as camel jockeys in the United Arab Emirates.

Prior to joining Motley Rice in 2004, John served as counsel in a case brought under the Anti-Terrorism Act against various charitable organizations and political groups in the U.S. for supplying Hamas with material support and financial resources in the groundbreaking *Boim v. Quranic Literacy Institute*.

John has drafted various "friend of the court" briefs to the Supreme Court on issues related to anti-terrorism and customary international law on behalf of a broad range of individuals and organizations.

John has also handled multiple personal injury and wrongful death cases involving tour bus and commercial truck crashes, both domestic and international. In 2010, a tour bus operated by Boston-based Grand Circle Travel crashed near Aswan, Egypt, killing eight passengers and injuring numerous others. John and the Motley Rice litigation team filed suit on behalf of seven of the victims of the crash against the tour operator and negotiated a settlement for our clients in 2015.\*

A former independent terrorism consultant for the Washington, D.C.-based think tank, The Investigative Project on Terrorism, John served as a liaison and researcher working with the FBI, INS, and U.S. Customs on terrorism financing investigations related to Hamas and the Palestinian Islamic Jihad terrorist organizations.

John is a published author on counterterrorism and security and was a central contributor to the non-fiction work *American Jihad: The Terrorists Living Among Us* (Free Press 2002), which details the activities of organizations and individuals within the U.S. who provide material support and/or resources to Middle Eastern and Islamic terrorist organizations abroad.

John lives in Mount Pleasant, S.C., with his wife and two children, and serves as a deacon in his church.

**AWARDS AND ACCOLADES:****Public Justice Foundation****2016 Trial Lawyers of the Year****ASSOCIATIONS:****American Association for Justice****American Bar Association**, Section of International Law**South Carolina Association for Justice****Charleston County Bar Association****Robert T. Haefele**

LICENSED IN: DC, NJ, NY, PA, SC

ADMITTED TO PRACTICE BEFORE:

U.S. Court of Appeals for the Second, Third, Fourth and Eleventh Circuits, U.S. District Court for the District of Columbia, District of New Jersey and Southern District of New York

EDUCATION:

J.D., Rutgers University School of Law – Camden, 1989

B.A., Rutgers College, 1986

Robert Haefele has spent more than twenty years practicing in complex civil litigation, including asbestos, tobacco and other mass tort and product liability litigation. His area of primary emphasis involves anti-terrorism and human rights, analyzing and litigating complex, domestic and international matters to meet clients' goals of justice and accountability while simultaneously achieving positive social change.

Robert's current focus is on aiding the more than 6,500 family members and survivors of the 9/11 terrorist attacks Motley Rice represents. He is co-liaison counsel and an active member of the Personal Injury and Wrongful Death Plaintiffs' Steering Committee in *In re Terrorist Attacks on September 11, 2001*, U.S.D.C., S.D.N.Y., MDL 1570, lawsuits filed by Motley Rice's clients and others seeking to expose and bankrupt the alleged financiers and other supporters of al Qaeda terrorist activity.

Robert also played a central role in *In re September 11th Litigation*, Case No. 21-MC-97-AKH (S.D.N.Y.), involving more than 50 personal injury and wrongful death clients against the aviation and aviation security industries for their alleged failure to detect and prevent the 9/11 terrorist attacks. For both the

9/11 multidistrict terrorist financing litigation and 9/11 mass consolidations of the aviation security liability cases, Robert has appeared before the court for multiple hearings and oral arguments, directed and engaged in complex formal discovery, and managed informal investigative efforts involving, among other things, aviation security, designation of foreign terrorist individuals and entities, and elaborate webs of financial transactions.

In addition to traditional litigation efforts, Robert has provided substantial *pro bono* and other support to the survivors and families of those killed in the 9/11 attacks. From 2001-2004, he provided *pro bono* representation for more than 30 individuals, preparing and presenting their claims to the September 11th Victim Compensation Fund. Working with Motley Rice clients, legislators and leading experts in various industries, Robert also works to encourage legislative changes to help meet clients' goals of justice, accountability and positive social change. He has represented victims of other terrorist attacks and human rights violations in litigation including *Oran Almog v. Arab Bank*, a landmark lawsuit filed by victims of terrorist bombings in Israel against Arab Bank for its alleged role in financing Hamas and other Israeli terrorist organizations and *Krishanti v. Rajaratnum et al.*, 09-cv-5395 (D. N.J.), litigation against alleged financiers of the Tamil Tigers terrorist organization in Sri Lanka.

Representing Motley Rice clients in an array of other complex litigation matters, Robert worked on *World Holdings LLC, v. The Federal Republic of Germany*, a suit filed to collect unpaid pre-WWII German bonds. He has collaborated with members of the firm's securities team, litigating such cases as *In re MBNA Corp. Sec. Litig.*, No. 05-272 (D. Del.), and with the toxic exposure team to litigate cases brought by individuals and businesses suffering as a result of the BP oil spill in *In re Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010*.

Robert has also represented plaintiffs in a wide array of complex personal injury actions, including representing women suffering from painful side effects associated with pelvic mesh/sling products and representing individual smokers and families of deceased smokers against tobacco manufacturers in the Engle-progeny litigation pending in Florida. Robert managed discovery and fact and expert depositions in multiple pelvic mesh/sling and tobacco matters and was part of the trial team for *Brown v. R.J. Reynolds Tobacco Co.*, an individual Engle-progeny tobacco case in federal court that resulted in a \$17.28M jury award.\*

Prior to joining Motley Rice in 2003, Robert developed a strong co-counsel relationship with Motley Rice attorneys through complex litigation involving corporate wrongdoing, including the State of New Jersey's tobacco lawsuit and other tobacco, asbestos and occupational disease and injury cases. Practicing product liability, toxic and mass tort, and occupational injury law, he represented individuals and union members injured by defective products or toxic substances and authored "The Hidden Truth About Asbestos Disease" in the *New Jersey Law Journal* (December 2002). He clerked with Judge Neil F. Deighan of the Appellate Division of the Superior Court of New Jersey in 1990.

## ASSOCIATIONS:

**American Association for Justice**

**American Bar Association**

**New Jersey State Bar Association**, Past Chairman – Product Liability and Toxic Tort Section

**Public Justice Foundation**

## Brian Frutig

LICENSED IN: NY, SC

### EDUCATION:

J.D., William & Mary School of Law, 2008

M.A., King's College London, University of London, 2005

B.A., Georgetown University, 2000

Brian Frutig represents victims of international terrorism and human rights violations as part of Motley Rice's Anti-Terrorism and Human Rights practice group. He assists with the firm's groundbreaking litigation against the financiers of al Qaeda on behalf of 6,500 family members and survivors of the September 11, 2001, attacks. Brian also litigates cases involving the Anti-Terrorism Act, the Alien Tort Claims Act, the Foreign Sovereign Immunities Act and international humanitarian law in U.S. courts.

As a law student, Brian gained international law experience as a legal assistant at the Association of Defense Counsel practicing at the International Criminal Tribunal for the Former Yugoslavia. In this role, he conducted legal research on international law, compiled witness summaries, and prepared exhibits on sensitive materials, including military and tactical information of the Yugoslav/Serbian military, the Kosovo Liberation Army and the North Atlantic Treaty Organization (NATO). Brian combines his legal experience with his graduate degree in international conflict analysis, where he studied international criminal law and the impact of international criminal tribunals on post-conflict redevelopment, particularly in Sierra Leone.

Brian uses his extensive background in global sales and marketing research and consulting to support the Motley Rice Securities and Consumer Fraud practice group. During his time at MarketBridge Corporation, an international sales and marketing professional services firm, Brian conducted research in finance, hi-tech and telecommunications industries and developed corporate planning and strategy programs for Fortune 500 clients while working out of the company's Bethesda, Maryland, and London, England, offices. His work included developing complex strategic change programs, market evaluations, budgeting processes and marketing strategies.

\* Prior results do not guarantee a similar outcome.



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Joseph F. Rice (DC, SC) is the attorney responsible for this communication.  
Prior results do not guarantee a similar outcome.  
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